

1 J. Paul Gignac, State Bar No. 125676  
2 Mischa N. Bartea, State Bar No. 274474  
3 **ARIAS OZZELLO & GIGNAC LLP**  
4 115 S. La Cumbre Lane, Suite 300  
5 Santa Barbara, California 93105  
6 Telephone: (805) 683-7400  
7 Facsimile: (805) 683-7401  
8 j.paul@aogllp.com  
9 mbarteau@aogllp.com

10 J.A. Ted Baer, State Bar No. 135092  
11 **LAW OFFICE OF J.A. TED BAER**  
12 21 E. Canon Perdido Street, Suite 223  
13 Santa Barbara, California 93101  
14 Telephone: (805) 963-7177  
15 Facsimile: (801) 730-2874  
16 ted@tedbaerlaw.com

17 Attorneys for Plaintiff  
18 Kelly Wilson

19 **UNITED STATES DISTRICT COURT**

20 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

21 KELLY WILSON, an individual,

22 Plaintiff,

23 vs.

24 THE WALT DISNEY COMPANY, a Delaware  
25 corporation; DISNEY ENTERPRISES, INC., a  
26 Delaware corporation; WALT DISNEY  
27 PICTURES, a California corporation; WALT  
28 DISNEY MOTION PICTURES GROUP, INC.,  
a California corporation; and DOES 1 through  
25, inclusive,

29 Defendants.

30 Case No. 3:14-cv-01441-VC

31 **DECLARATION OF J. PAUL GIGNAC  
32 IN SUPPORT OF PLAINTIFF'S  
33 ADMINISTRATIVE MOTION TO FILE  
34 UNDER SEAL EXHIBITS TO  
35 DECLARATION OF MISCHA N.  
36 BARTEAU IN SUPPORT OF  
37 PLAINTIFF'S MOTION FOR PARTIAL  
38 SUMMARY JUDGMENT**

39 Judge: Hon. Vince G. Chhabria

40 Date: April 9, 2015

41 Time: 10:00 a.m.

42 Ctrm: 4

**DECLARATION OF J. PAUL GIGNAC**

I, J. Paul Gignac, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I have personal knowledge of the matters stated herein. If called as a witness, I could and would testify truthfully and competently thereto under oath.

2. I have been admitted and licensed to practice before all of the courts of the State of California since 1986. I have at all times since then been a member in good standing of the California State Bar. I have been admitted to and have practiced before the United States District Court for the Northern District of California since 1987.

3. I am a partner with the law firm of Arias Ozzello & Gignac LLP, one of the law firms representing plaintiff Kelly Wilson (“Plaintiff”) in this action.

4. I submit this declaration in support of Plaintiff's Administrative Motion to File Under Seal Exhibits to Declaration of Mischa N. Barteau in Support of Plaintiff's Motion for Partial Summary Judgment, as required by Local Rule 79-5(e).

5. Defendants in this action have designated as either "confidential" or "highly confidential/attorneys' eyes only" the entirety of each of the documents attached as Exhibits 1, 20-41, 43-52 and 54-67 to the Declaration of Mischa N. Barteau in Support of Plaintiff's Motion for Partial Summary Judgment.

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

Executed this 5th day of March 2015, at Santa Barbara, California.

J. Paul Gignac